JAN 2 3 2014

CENTRAL DISTRICT OF CALIFORNIA
BY

CENTRAL DISTRICT OF CALIFORNIA
BY

DEFUTY

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2013 Grand Jury

CR14-0041

UNITED STATES OF AMERICA,

Plaintiff,

ν.

KAREN AHARONIAN, aka "Michael 3,"

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Defendant.

CR No. 14-

INDICTMENT

[18 U.S.C. § 1956(a)(1)(B)(i): Money Laundering]

The Grand Jury charges:

COUNTS ONE THROUGH SEVEN

[18 U.S.C. § 1956(a)(1)(B)(i)]

1. On or about the following dates, in Los Angeles County, within the Central District of California, and elsewhere, defendant KAREN AHARONIAN, also known as "Michael 3" ("defendant AHARONIAN"), knowing that the property involved in each of the financial transactions described below represented the proceeds of some form of unlawful activity, attempted to conduct and conducted the following financial transactions involving the use of a financial institution, which transactions involved the proceeds of specified unlawful activity, namely, mail and wire fraud, in violation of Title 18,

United States Code, Sections 1341 and 1343, knowing that each of the transactions was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of such specified unlawful activity:

5	COUNT	DATE	FINANCIAL TRANSACTION	SPECIFIED UNLAWFUL ACTIVITY
	1	8/26/10	Transfer of the	mail fraud involving the
6		,	following two tax	submission of false and
7			refund checks:	fraudulent tax returns
′				resulting in the issuance
8			a. \$8,638 check in the	of tax refund checks sent
			name of L.V.; and	by United States mail
9			b. \$12,599 check in	
10			the name of Q.H.	
11	2	8/28/10	Transfer of the	mail fraud involving the
12		' - '	following three tax	submission of false and
			refund checks:	fraudulent tax returns
13				resulting in the issuance
14			a. \$13,370 check in	of tax refund checks sent
14			the name of S.L.;	by United States mail
15			b. \$11,466 check in	
			the name R.H.; and c. \$8,239 check in the	
16			name of T.L.	
17	3	3/27/12	Transfer of the	mail fraud involving the
			following nine tax	submission of false and
18			refund checks:	fraudulent tax returns
19				resulting in the issuance
± 2			a. \$8,127 check in the	of tax refund checks sent
20			name of R.K.;	by United States mail
_			b. \$8,127 check in the	
21			name of A.S.; c. \$8,127 check in the	
22			name of A.O.;	
			d. \$8,127 check in the	
23			name of M.S.;	
24			e. \$8,127 check in the	
			name of I.R.;	
25			f. \$2,890.76 check in	
ا ء د			the name of J.Y.;	
26			g. \$407.30 check in the name of S.S.;	
27			h. \$8,127 check in the	
			name of S.S.; and	
28				
	<u></u>		2	

i. \$8,127 check in the name of A.A. 4 9/05/12 Transfer of the following checks: a. checks numbered 1017 through 1020 written on the Charlie White Trucking account xxxx xxxx 3683 at Bank of America; 8 a b. checks numbered 5208 through 5211 written on the Juarez JJ Painting account xxxx xxxx 3684 at Bank of America; b. checks numbered 5208 through 5211 written on the Juarez JJ Painting account xxxx xxxx 3864 at Bank of America; c. checks numbered 1269 through 1272 written on the Kogut Best Opportunities account xxxx xxxx xxx 6562 at x refund in the issuance of a tax refund in the amount of \$16,800.64 in the	1	COUNT	DATE	FINANCIAL TRANSACTION	SPECIFIED UNLAWFUL ACTIVITY
a. checks numbered 1017 through 1020 written on the Charlie White Trucking account xxxx xxxx 3683 at Bank of America; b. checks numbered 5208 through 5211 written on the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America; b. checks numbered 5208 through 5211 syninterstate written on the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America; c. checks numbered 5208 through 5211 syninterstate written on the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America; c. checks numbered 5208 through 1272 written on the Kogut Best Opportunities account xxxx xxxx 8364 at Bank of America c. checks numbered 5208 through 1272 written on the Kogut Best Opportunities account xxxx xxxx 8364 at Bank of America c. checks numbered 5208 through 1272 written on the Kogut Best Opportunities account xxxx xxxx 8364 at Bank of America c. checks numbered 5208 through 1272 written on the Kogut Best Opportunities account xxxx xxxx 8364 at Bank of America c. checks numbered 5208 through 5211 syninterstate wire to the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America c. checks numbered 5208 through 5211 syninterstate wire to the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America c. checks numbered 5208 through 5211 syninterstate wire to the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America c. checks numbered 5208 through 5211 syninterstate wire to the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America c. checks numbered 5208 through 5211 syninterstate wire to the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America	2			-	
following checks: a. checks numbered 1017 through 1020 written on the Charlie White Trucking account xxxx xxxx 3683 at Bank of America; b. checks numbered 5208 through 5211 written on the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America; b. checks numbered 5208 through 5211 written on the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America; c. checks numbered 16 17 18 20 21 22 22 23 24 25 26 26 26 27 28 29 29 20 20 20 20 21 21 22 22 24 25 26 26 26 27 28 29 29 20 20 20 20 21 21 22 22 23 24 25 26 26 28 28 29 29 20 20 20 20 21 21 22 23 24 25 26 26 27 28 29 29 20 20 20 20 21 21 22 22 23 24 25 26 26 28 28 29 29 20 20 20 20 20 21 21 22 22 23 24 25 26 26 26 27 28 29 29 20 20 20 20 21 21 22 22 23 24 25 26 26 26 27 28 29 29 20 20 20 20 20 21 21 22 22 23 24 25 26 26 27 28 28 29 29 20 20 20 20 20 20 20 21 21 22 22 23 24 25 26 26 26 27 28 28 28 28 28 28 28 28 28 28 28 28 28	2		0/05/10		
a. checks numbered 1017 through 1020 written on the Charlie White Trucking account xxxx xxxx 3683 at Bank of America; at Bank of America; b. checks numbered 5208 through 5211 written on the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America; b. checks numbered 5208 through 5211 written on the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America; c. checks numbered 1269 through 1272 written on the Kogut Best Opportunities account xxxx xxxx 8364 at Bank of America c. checks numbered 1269 through 1272 written on the Kogut Best Opportunities account xxxx xxxx 8364 at Bank of America c. checks numbered 1269 through 1272 written on the Kogut Best Opportunities account xxxx xxxx 8364 at Bank of America c. decks numbered 1269 through 1272 written on the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America a. wire fraud involving the submission of false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$16,800.64 in the name of D.S. sent by interstate wire to the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America c. wire fraud involving the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$16,800.64 in the name of D.S. sent by interstate wire to the Submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$20,140.45 in the name of D.S. sent by interstate wire to the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America	·	 4 	9/05/12		
submission of false and fraudulent tax returns resulting in the issuance of a tax refund in the amount of \$20,055.49 in the name of \$20,055.49 in the name of \$20,055.49 in the name of \$60,055.49 in the name of \$60,055.40 in th	4	-		a. checks numbered	a. wire fraud involving the
white Trucking account xxxx xxxx 3683 at Bank of America; b. checks numbered 5208 through 5211 written on the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America; b. wire fraud involving the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$10,000 and the pair to the Charlie White Trucking account xxxx xxxx xxx xxxx xxx xxx xxx xxx xx	5			1017 through 1020	submission of false and
at Bank of America; amount of \$12,335.71 in the name of A.K. and a tax refund in the amount of \$20,055.49 in the name of R.G. sent by interstate wire to the Charlie White Trucking account xxxx xxxx 3683 at Bank of America b. checks numbered 5208 through 5211 written on the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America; b. wire fraud involving the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$16,800.64 in the name of D.S. sent by interstate wire to the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America c. checks numbered 1269 through 1272 written on the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America; c. wire fraud involving the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$20,140.45 in the name of S.R. sent by interstate wire to the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America	6			White Trucking	resulting in the issuance
refund in the amount of \$20,055.49 in the name of R.G. sent by interstate wire to the Charlie White Trucking account xxxx xxxx 3683 at Bank of America b. checks numbered 5208 through 5211 written on the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America; b. wire fraud involving the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$16,800.64 in the am	7				of a tax refund in the amount of \$12,335.71 in the
\$20,055.49 in the name of R.G. sent by interstate wire to the Charlie White Trucking account xxxx xxxx 3683 at Bank of America b. checks numbered 5208 through 5211 written on the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America; b. wire fraud involving the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$16,800.64 in the amount of \$16,800.64 in the amount of \$16,800.64 in the name of D.S. sent by interstate wire to the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America c. checks numbered 1269 through 1272 written on the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America c. wire fraud involving the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$20,140.45 in the name of S.R. sent by interstate wire to the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America	8			· .	i :
b. checks numbered 5208 through 5211 written on the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America; c. checks numbered 1269 through 1272 written on the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America; wire to the Charlie White Trucking account xxxx xxxx 3683 at Bank of America b. wire fraud involving th submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$16,800.64 in th name of D.S. sent by interstate wire to the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America c. wire fraud involving th submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the submission of a false and fraudulent tax return fraudulent tax return resulting in the issuance of a tax refund in the submission of a false and fraudulent tax return fraudulent tax return resulting in the issuance of a tax refund in the submission of a false and fraudulent tax return fraudulent tax return resulting in the issuance of a tax refund in the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$16,800.64 in th name of D.S. sent by interstate wire to the Submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$16,800.64 in th name of D.S. sent by interstate wire to the Submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$16,800.64 in th name of D.S. sent by interstate wire to the Submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$16,800.64 in th name of D.S. sent by interstate wire to the Submission of a false and fraudu	9				\$20,055.49 in the name of
b. checks numbered 5208 through 5211 written on the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America; c. checks numbered fraudulent tax return resulting in the issuance of a tax refund in the amount of \$16,800.64 in th name of D.S. sent by interstate wire to the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America c. checks numbered 1269 through 1272 written on the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America; c. wire fraud involving th submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the submission of a talse and fraudulent tax return resulting in the issuance of a tax refund in the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$10,800.64 in th name of D.S. sent by interstate wire to the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America	10				wire to the Charlie White
b. checks numbered 5208 through 5211 written on the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America; c. checks numbered 120 20 21 22 22 23 24 25 26 b. wire fraud involving the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$16,800.64 in the name of D.S. sent by interstate wire to the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America c. checks numbered 1269 through 1272 written on the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America; c. wire fraud involving the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the submission of a false and fraudulent tax xxxx xxxx 8364 at Bank of America	11				, ,
5208 through 5211 written on the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America; 16 17 18 19 20 20 21 21 22 22 23 24 25 26 26 26 27 28 28 29 29 20 20 20 20 20 21 22 23 24 25 26 26 28 29 20 20 20 20 20 21 22 23 24 25 26 26 27 28 28 29 20 20 20 20 20 20 20 20 20 20 20 20 20	12			h shocks numbered	h wire fraud involving the
JJ Painting account xxxx xxxx 8364 at Bank of America; resulting in the issuance of a tax refund in the amount of \$16,800.64 in the name of D.S. sent by interstate wire to the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America c. checks numbered 1269 through 1272 written on the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America; c. wire fraud involving the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$20,140.45 in the name of S.R. sent by interstate wire to the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America	13		;	5208 through 5211	submission of a false and
of America; amount of \$16,800.64 in the name of D.S. sent by interstate wire to the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America c. checks numbered 1269 through 1272 written on the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America; c. wire fraud involving the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$20,140.45 in the name of S.R. sent by interstate wire to the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America	14		·		}
interstate wire to the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America c. checks numbered 1269 through 1272 written on the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America; c. wire fraud involving th submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$20,140.45 in th name of S.R. sent by interstate wire to the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America	15				amount of \$16,800.64 in the
xxxx xxxx 8364 at Bank of America c. checks numbered c. wire fraud involving th submission of a false and fraudulent tax return Best Opportunities account xxxx xxxx 6562 at Bank of America xxxx xxxx 8364 at Bank of America c. wire fraud involving th submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$20,140.45 in th name of S.R. sent by interstate wire to the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America	16				·
America 20 c. checks numbered 1269 through 1272 written on the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America; 23 24 25 America c. wire fraud involving th submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$20,140.45 in th name of S.R. sent by interstate wire to the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America	17				Juarez JJ Painting account
20 1269 through 1272 written on the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America; 23 24 25 26 C. Wife Hadd involving the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$20,140.45 in the name of S.R. sent by interstate wire to the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America	18		,		
written on the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America; fraudulent tax return resulting in the issuance of a tax refund in the amount of \$20,140.45 in th name of S.R. sent by interstate wire to the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America	19				c. wire fraud involving the
account xxxx xxxx 6562 at Bank of America; of a tax refund in the amount of \$20,140.45 in th name of S.R. sent by interstate wire to the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America	20			_	l P
at Bank of America; amount of \$20,140.45 in the name of S.R. sent by interstate wire to the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America	21			- ~	
23 24 25 26 interstate wire to the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America	22				amount of \$20,140.45 in the
account xxxx xxxx 6562 at Bank of America	23		-		interstate wire to the
26	24				
	25				Bank of America
27	26	·		ļ	
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28	28				

1	COUNT	DATE	FINANCIAL TRANSACTION	SPECIFIED UNLAWFUL ACTIVITY
2			d. checks numbered	d. wire fraud involving the
			1610 through 1613 written on the Adams	submission of false and fraudulent tax returns
3			Trucking account xxxx	resulting in the issuance
4		•	xxxx 0059 at Bank of	of a tax refund in the
5			America;	amount of \$24,115 in the name of L.W. and a tax
ا "				refund in the amount of
6				\$23,120 in the name of J.R.
7				sent by interstate wire to
			· .	the Adams Trucking account xxxx xxxx 0059 at Bank of
8				America
9				
10			e. checks numbered 1508 and 1509 written	e. wire fraud involving the submission of false and
			on the Ignatova Design	fraudulent tax returns
11			account xxxxx-x6358	resulting in the issuance
12		T.	at Bank of America;	of a tax refund in the amount of \$14,860 in the
13				name of A.A. and a tax
				refund in the amount of
14				\$8,349 in the name of R.H.
15			· 	sent by interstate wire to the Ignatova Design account
16			·	xxxxx-x6358 at Bank of
				America
17			f. checks numbered	f. wire fraud involving the
18			1140 through 1143	submission of a false and
19		· .	written on the Shaver	fraudulent tax return
			Distribution account	resulting in the issuance of a tax refund in the
20	,		of America; and	amount of \$24,562 in the
21				name of W.W. sent by interstate wire to the
22		i		Shaver Distribution account
				xxxx xxxx 7685 at Bank of
23				America
24			g. checks numbered	g. wire fraud involving the
25			1666 through 1669	submission of a false and
			written on the	fraudulent tax return
26			Kosheleva Wholesale account xxxx xxxx 6361	resulting in the issuance of a tax refund in the
27			at Bank of America.	amount of \$23,640 in the
28			·	name of J.K. sent by
۷٥				interstate wire to the

1	COUNT	DATE	FINANCIAL TRANSACTION	SPECIFIED UNLAWFUL ACTIVITY
2				Kosheleva Wholesale account
				xxxx xxxx 6361 at Bank of America
3	5	9/14/12	Transfer of the	America
4			following checks:	
5			a. checks numbered	a. wire fraud involving the submission of false and
6			written on the Torres Trucking account xxxx	fraudulent tax returns resulting in the issuance
7			xxxx 8247 at Bank of	of a tax refund in the
8			America;	amount of \$8,312.47 in the name of E.A. and a tax
9				refund in the amount of \$26,545 in the name of D.H.
10				sent by interstate wire to the Torres Trucking account
11				xxxx xxxx 8247 at Bank of
12			· .	America
13			b. checks numbered 1010 through 1012	b. wire fraud involving the submission of false and
14			written on the Jaynes Fire Extinguishers	fraudulent tax returns resulting in the issuance,
15			account xxxx xxxx 4646 at Bank of America;	of a tax refund in the amount of \$12,103.58 in the
16			at Ballk Of America,	name of M.S. and a tax refund in the amount of
17 18	·	r		\$14,332 in the name of D.T. sent by interstate wire to
19				the Jaynes Fire
20				Extinguishers account xxxx xxxx 4646 at Bank of
				America
21			c. checks numbered	c. wire fraud involving the
22			1007 through 1010 written on the Castle	submission of a false and fraudulent tax return
23			Printing account xxxx	resulting in the issuance
24			xxxx 5674 at Bank of America;	of a tax refund in the amount of \$21,004 in the
25			,	name of J.M. sent by interstate wire to the
26				Castle Printing account
27				xxxx xxxx 5674 at Bank of America
28				

1	COUNT	DATE	FINANCIAL TRANSACTION	SPECIFIED UNLAWFUL ACTIVITY
2			d. checks numbered 5212 through 5214 and	d. wire fraud involving the submission of a false and
3			5216 written on the Juarez JJ Painting	fraudulent tax return resulting in the issuance
4			account xxxx xxxx 8364	of a tax refund in the
			at Bank of America;	amount of \$21,155 in the
5			and	name of A.B. sent by interstate wire to the
6.				Juarez JJ Painting account
7				xxxx xxxx 8364 at Bank of America
8				America
			e. checks numbered	e. wire fraud involving the submission of a false and
9			1214 through 1217 written on the Michael	fraudulent tax return
10			Custom Printing	resulting in the issuance
11		Ī.	account xxxx xxxx 8464 at Bank of America.	of a tax refund in the amount of \$22,290 in the
12				name of D.G. sent by interstate wire to the
13				Michael Custom Printing
				account xxxx xxxx 8464 at
14	6	10/4/12	Transfer of the	Bank of America
15		10/4/12	following checks:	
16			a. checks numbered	a. wire fraud involving the submission of false and
17	!		1014 and 1015 written on the Millsap	fraudulent tax returns
18			Trucking account xxxx	resulting in the issuance
19			xxxx 5043 at Bank of America; and	of a tax refund in the amount of \$19,340.38 in the
20				name of P.B. and a tax
				refund in the amount of \$9,611.39 in the name of
21				R.Q. sent by interstate
22				wire to the Millsap Trucking account xxxx xxxx
23				5043 at Bank of America
24				
ļ		:	b. checks numbered 2018 through 2022	b. wire fraud involving the submission of a false and
25			written on the Matthew	fraudulent tax return
26			Sims Accounting account xxxx xxxx 0926	resulting in the issuance of a tax refund in the
27			at Bank of America.	amount of \$25,501 in the
28				name of M.G. sent by
~				interstate wire to the

1	COUNT	DATE	FINANCIAL TRANSACTION	SPECIFIED UNLAWFUL ACTIVITY
2				Matthew Sims Accounting account xxxx xxxx 0926 at
3				Bank of America
	7	10/30/12	ł	
4		!	following checks:	·
5			a. checks numbered 327 through 333 written on	a. wire fraud involving the submission of false and
6			the Oscar Villalta	fraudulent tax returns
7			account xxxx xxxx 5865 at Bank of America;	resulting in the issuance of a tax refund in the
8				amount of \$25,499 in the name of K.A. and a tax
9				refund in the amount of
10				\$25,499 in the name of S.P. sent by interstate wire to
11				the Oscar Villalta account xxxx xxxx 5865 at Bank of
12				America
13			b. checks numbered	b. wire fraud involving the
14			1512 through 1514 written on the	submission of false and fraudulent tax returns
15		,	Ignatova Design account xxxxx-x6358 at	resulting in the issuance of a tax refund in the
16			Bank of America;	amount of \$23,625 in the name of M.G., a tax refund
17	·			in the amount of \$24,339 in the name of K.G., a tax
18				refund in the amount of
19				\$23,625 in the name of L.V. and a tax refund in the
20				amount of \$23,625 in the name of D.T. sent by
21				interstate wire to the
22				Ignatova Design account xxxxx-x6358 at Bank of
23				America
24			c: checks numbered	c. wire fraud involving the submission of a false and
25			2002 and 2006 through 2008 written on the	fraudulent tax return
26		!	Bocharov Electric Service account xxxxx-	resulting in the issuance of a tax refund in the
27			x2202 at Bank of	amount of \$17,408.85 in the
28			America;	name of L.M. sent by interstate wire to the
∠° ∥				Bocharov Electric Service

1	COUNT	DATE	FINANCIAL TRANSACTION	SPECIFIED UNLAWFUL ACTIVITY
2			,	account xxxxx-x2202 at Bank of America
3			d. checks numbered	d. wire fraud involving the
4			1011 through 1014 written on the Castle	submission of a false and fraudulent tax return
5			Printing account xxxx	resulting in the issuance
6			xxxx 5674 at Bank of America; and	of a tax refund in the amount of \$18,032 in the
7				name of A.P. sent by interstate wire to the
8		·		Castle Printing account xxxx xxxx 5674 at Bank of
9	:			America
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1	COUNT	DATE	FINANCIAL TRANSACTION	SPECIFIED UNLAWFUL ACTIVITY
2			e. checks numbered 1014 through 1016	e. wire fraud involving the submission of a false and
3			written on the Sexton Consulting account	fraudulent tax return resulting in the issuance
4			xxxx xxxx 4911 at Bank	of a tax refund in the
5			of America.	amount of \$15,158 in the name of S.B. sent by
6				interstate wire to the
7		i	o	Sexton Consulting account xxxx xxxx 4911 at Bank of America
8			·	
9				
10				

A TRUE BILL

Foreperson

ANDRÉ BIROTTE JR. United States Attorney

ROBERT E. DUGDALE Assistant United States Attorney Chief, Criminal Division

STEPHEN A. CAZARES Assistant United States Attorney Acting Chief, Major Frauds Section

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